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District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHARONE RANDOLPH,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00555-JAD-PAL

**JOINT STIPULATION FOR EXTENSION OF
TIME AND [PROPOSED ORDER]**

(SECOND REQUEST)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from October 29, 2018 to **November 29, 2018**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out of the office for the last two weeks on intermittent sick leave for the flu/acute pneumonia. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until mid-November. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation. Counsel also has a Ninth Circuit brief due in mid-November, which requires multiple levels of review. Due to Counsel's

1 unexpected leave, Counsel became behind on her heavy workload. As such, Counsel needs additional
2 time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary
3 Judgment. Defendant makes this request in good faith with no intention to unduly delay the
4 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly.
6

7 Respectfully submitted,

8 Dated: October 25, 2018

/s/ *Cyrus Safa
(*as authorized by email on October 24, 2018)
CYRUS SAFA
Attorney for Plaintiff

12 Dated: October 25, 2018


DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

19 **ORDER**

21 APPROVED AND SO ORDERED:

23 DATED: October 29, 2018


HON. PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED] ORDER** on the date
4 and via the method of service identified below:

5 **CM/ECF:**

6
7 Cyrus Safa
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22 Attorneys for Plaintiff

23
24 Respectfully submitted this 25th day of October 2018,

25
26 /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney